

**Comments in response to:
FCC Public Notice DA 12-523
GN Docket No. 12-91**

This submission is in response to *Question 2* of GN Docket No. 12-91 seeking comments on impediments to enhanced Amateur Radio Service communications and recommendations regarding the removal of such impediments.

INTRODUCTION

I am 84 years-old, have been an FCC-licensed amateur radio operator for 60 years, and presently reside in a third-floor apartment in a retirement community. I have attempted to operate my amateur radio station for several years from this location using antennas of drastically limited capabilities erected entirely on my balcony or, by necessity, in close proximity to a building wall. Performance of my station with compromised antennas has been thoroughly unsatisfactory; transmissions suffer from inherent inefficiency of a short and poorly-sited antenna, and reception is limited to very strong signals, i.e., greater than 50 μ V/m (S9) due to presence of severe electrical noise and RF interference emanating from my building and other nearby sources.

A VIABLE SOLUTION DENIED

A simple solution exists to avoid the manifold limitations imposed by compromise antennas: it is to erect a single, virtually invisible wire from my balcony to a stout tree located 170 feet distant. I recently submitted a proposal to the management of my retirement community for permission to erect such an antenna. The proposal was accompanied with extensive documentation covering all aspects of health, safety, aesthetics, and technical performance, and a copy of FCC PRB-1 to emphasize the Commission's view to, "... accommodate reasonably amateur communications." My request to erect such an innocuous antenna wire was denied because, "There is a corporate rule prohibiting any extension from an apartment to another structure."

BACKGROUND

The retirement complex where I live is owned by ACTS Retirement-Life Communities (ACTS), a non-profit corporation that owns or operates twenty-three facilities in eastern states. ACTS is but one of hundreds of Continuing Care Retirement Communities (CCRCs) that proliferate throughout the United States, attracting senior citizens wishing to "downsize" from home ownership to a secure, worry-free lifestyle. Many CCRC residents are "hams" who desire to continue participation in the Amateur Radio Service. As the average age of radio amateurs (currently estimated to be 60 years) rises along with the general population, the number of amateurs moving into CCRCs will increase dramatically in the future. It is vital that those citizens not be deprived of access to the Service by impediments arbitrarily imposed by CCRCs.

RECOMMENDATION

The personal experience with a typical CCRC related above resoundingly demonstrates that the declaratory nature of FCC PRB-1, however well-intended, is insufficient to protect the privileges of CCRC residents licensed to operate in the Amateur Radio Service. Amateur radio operators living in retirement communities require new protection through implementation of explicit Federal Regulations that preclude all impediments to legal use of the Service.

Respectfully submitted,
Robert G. Thomas
3314 Twin Silo Drive, Blue Bell, PA 19422
W3NE@Comcast.net

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